



MICHAEL A. CARDOZO  
Corporation Counsel

CARDZO

THE CITY OF NEW YORK  
LAW DEPARTMENT

100 CHURCH STREET  
NEW YORK, NY 10007

ISAAC KLEPFISH

Phone (212) 788-0897

Fax: (212) 788-0877

E-mail: iklepfis@law.nyc.gov

JAN 22 2008

January 18, 2008

MEMO ENDORSED

BY HAND DELIVERY

Honorable William H. Pauley  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Application denied.*  
SO ORDERED:

*William H. Pauley III*  
WILLIAM H. PAULEY III U.S.D.J.

Re: Ali v. City of New York, et al.  
07 CV 6153 (WHP)

*1/23/08*  
*See this Court's Individual Practices, Rule 3(A)(iii).*

Dear Judge Pauley:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel for the City of New York, assigned to represent defendants in the above referenced action. I write this letter seeking the Court to order that plaintiff produce documents in order that defendants may depose plaintiff. Specifically, on or about November 26, 2007, I served plaintiff with defendants' First Combined Set of Interrogatories and Requests for Documents. Plaintiff's counsel did not respond to these discovery requests nor did he seek an extension of time to respond thereto. Additionally, on January 3, 2008, I served plaintiff with a Notice of Deposition for January 30, 2008. On that date I also wrote a letter to plaintiff's counsel advising him that to proceed with the deposition of his client I needed the discovery responses. I also called plaintiff's counsel and left him a phone message. To date, I still have not received responses to my discovery demands nor have I heard from plaintiff's counsel. I should also note, that plaintiff has not served defendants with any discovery demands.

Accordingly, because of the discovery deadline of January 31, 2008 and because I have not received any responses to my discovery requests, it is respectfully requested that Your Honor direct that plaintiff produce responses to the discovery requests by a date certain to enable defendants to conduct the deposition of plaintiff.

Thank you for your courtesies in this matter.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Isaac Klepfish", written in a cursive style.

ISAAC KLEPFISH (IK-3478)  
Assistant Corporation Counsel

cc. Anthony Emengo, Esq. by mail